

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of DAVID A. GODFREY, :
YUKOS FINANCE B.V. and YUKOS :
INTERNATIONAL UK B.V. for an order to :
conduct discovery for use in a foreign : No. 1:15-MC-325
proceeding. :
Petitioners. :
: X

**DECLARATION OF JESSICA OLIFF DALY IN SUPPORT OF RESPONDENTS' REPLY
MEMORANDUM OF LAW IN OPPOSITION TO PETITIONERS' MOTION TO
COMPEL COMPLIANCE WITH SUBPOENAS *DUCES TECUM* AND IN SUPPORT OF
RESPONDENTS' MOTION TO QUASH SUBPOENAS *AD TESTIFICANDUM***

I, Jessica Oliff Daly, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am counsel with the law firm of Akin Gump Strauss Hauer & Feld LLP, counsel for Respondents Jeffrey Johnson, Richard Deitz, and VR Capital in the above-captioned matter. I am admitted to practice before this Court and I submit this declaration in Support of Respondents' Reply Memorandum of Law in Opposition to Petitioners' Motion to Compel Compliance with Subpoenas *Duces Tecum* and in Support of Respondents' Motion to Quash Subpoenas *Ad Testificandum*.

2. Attached hereto as Exhibit A is Petitioners' Memorandum of Law In Opposition to Respondents' Motion to Quash Subpoenas Issued Pursuant to 28 U.S.C. § 1782 dated October 19, 2007, S.D.N.Y. Case No. MC-19-99.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on this 8th day of January 2016.

/s/ Jessica Oliff Daly
JESSICA OLIFF DALY